

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

**THE ESTATE OF LALIAH SWAYZER,
SHADE SWAYZER,
DIANE RUFFIN, and
CHARLENE RUFFIN,**

Plaintiffs,

CASE NO. 16CV1703

v.

**DAVID J. CLARKE JR.,
KIMBERLY WITKOWIAK,
KEVIN UTSBY,
KEZIAH LOVE,
T. CUNNINGHAM,
JEFF ANDRYKOWSKI,
PAUL HEIN,
MILWAUKEE COUNTY,
WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION,
ARMOR CORRECTIONAL HEALTH SERVICES, INC.,
DR. MAUREEN WHITE,
DR. RONQUILLO-HORTON,
N.P. KATHERINE MEINE,
DR. GINA NEGRETTE,
R.N. FREDRICK PORLUCAS,
DR. TURAY GULSEN,
EVANSTON INSURANCE COMPANY, and
WISCONSIN HEALTH CARE LIABILITY INSURANCE PLAN,**

Defendants.

**CIVIL L. R. 7(h) EXPEDITED NON-DISPOSITIVE
JOINT MOTION TO EXTEND DEADLINES**

The undersigned Defendants in this matter, by and through their respective counsel, hereby jointly request that the deadlines governing the disclosure of expert witnesses, discovery completion, and filing of dispositive motions be extended as follows:

1. The Defendants shall disclose their expert witnesses, along with reports and supporting documentation, by April 30, 2019.

2. The Plaintiffs shall identify any rebuttal expert witnesses and disclose their reports by May 15, 2019.

2. The parties shall complete all fact discovery no later than April 15, 2019.

3. The parties shall complete all expert discovery no later than July 15, 2019.

4. Dispositive motions shall be filed no later than May 31, 2019.

The basis for this motion is that Defendant Armor Correctional Health Services, Inc. has retained MWH Law Group LLP as new counsel in the place of Hinshaw & Culbertson LLP who requires additional time to fully review the file and proceedings, adequately assess its need for expert witnesses, conduct additional discovery as may be appropriate, and prepare its summary judgment filings. Further, the other named Defendants join in this motion in that, given the challenges concomitant with multiple parties and the complexities of this case, additional time is needed to fully prepare their defenses.

Dated this 21st day of February, 2019.

s/ Emery K. Harlan

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